

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW HAMPSHIRE**

CONSERVATION LAW FOUNDATION, INC.,)

Plaintiff)

v.)

Case No. 1:22-cv-00067-JL

PROLERIZED NEW ENGLAND, LLC;)
JOINT VENTURE OPERATIONS, INC.;)
PROLERIDE TRANSPORT SYSTEMS, INC;)
and MAINE METAL RECYCLING, INC.,)

Defendants)

JOINT NOTICE REGARDING ENTRY OF CONSENT DECREE

Plaintiff Conservation Law Foundation (“CLF” or “Plaintiff”) and Defendants Prolerized New England, LLC., Joint Venture Operations, Inc., Proleride Transport Systems, Inc., and Maine Metal Recycling, Inc. (“Defendants”) (jointly “the Parties”) hereby provide notice that the United States Department of Justice reviewed the Proposed Consent Decree in this action and does not object to its entry by this Court. See Ex. 1 (Letter from U.S. Department of Justice) and its attached Exhibit A (Letter from Merrimack River Watershed Council). In addition, the 45-day review period ended on January 4, 2024.

Accordingly, the Parties request that the Court enter the previously filed Consent Decree. ECF No. 17-1 (Consent Decree). The Consent Decree represents a settlement of all claims presented by Plaintiff against the Defendants in this case. The Parties represent that the settlement terms are appropriate, reasonable, and in the public interest.

January 8, 2024

Respectfully submitted,

CONSERVATION LAW FOUNDATION, INC.

By its attorneys:

/s/ Thomas F. Irwin

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PROLERIZED NEW ENGLAND, LLC;
JOINT VENTURE OPERATIONS, INC.;
PROLERIDE TRANSPORT SYSTEMS, INC.;
and MAINE METAL RECYCLING, INC.

By its attorneys:

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CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2024, the foregoing document was filed through the ECF system, by which means a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Thomas F. Irwin
Thomas F. Irwin